

Steve Zissou & Associates

42-40 Bell Boulevard | Suite 302 | Bayside | New York | 11361 | 718.279.4500 | stevezissou@stevezissouesq.com

BY ECF/EXPARTE AND UNDER SEAL

February 4, 2016

Honorable Judge Brian M. Cogan
United States District Judge
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States of America v. Howard Leventhal*
Criminal Docket No. 13-695 (BMC)

Dear Judge Cogan:

For the reasons set forth below, I write to request permission for Reynaldo Cusicanqui, mitigation specialist for the Consulting Project, to travel to Chicago, Illinois, to interview witnesses.

Mr. Cusicanqui has conducted preliminary interviews with a number of individuals and has advised me that he believes that it will be necessary to travel to Illinois in order to conduct a detailed psychological investigation, psychosocial assessment and mitigation evaluation of the defendant. As the Court is aware, Howard Leventhal is a lifelong resident of Illinois. All of his family members and closest friends also reside in Chicago as does Mr. Leventhal's 90 year old mother.

Under the circumstances, I believe that it is a reasonable and necessary request that will allow counsel to provide Mr. Leventhal with effective representation in this case. Since this application addresses issues related to strategy, it has been filed ex parte and under seal.

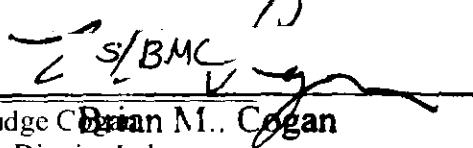
I have included a proposed order for the convenience of the Court.

Thank you for your consideration in this matter.

Respectfully submitted,


Steve Zissou
Steve Zissou, Esq.

SO ORDERED:

So Ordered: 
Honorable Judge Brian M. Cogan
United States District Judge
U.S. District Judge

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

ORDER
13-CR-695 (BMC)

v.

HOWARD LEVENTHAL,
Defendant.

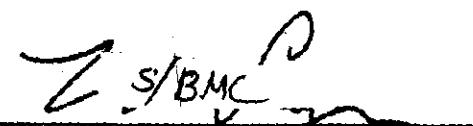
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Upon the application of Steve Zissou, attorney for the above named defendant, it is hereby,

ORDERED, pursuant to 18 U.S.C. 3006(A), that REYNALDO CUSICANQUI, is authorized to travel to the State of Illinois to confer with witnesses and conduct investigations as deemed warranted. Travel expenses will be paid in accordance with the Criminal Justice Act. Mr. Cusicanqui is authorized to contact the National Travel Service to request reservation and airline tickets at the government rate as well as suitable accommodations while traveling.

Dated: Brooklyn, New York
February , 2016

So Ordered:


Hon. Brian M. Cogan, U.S.D.J.
U.S. District Judge